REMARKS/ARGUMENTS

Claims 22-24 and 29-36 are pending in this application.

Claims 22-24 and 36 are amended.

Claims 37-39 are newly added.

1.   <u>Claims 22-24 and 36 were rejected under 35 USC 112 as failing to comply with the written description requirement.</u> Applicant's claim amendments delete the objected to language. In particular, Applicant's amended claims describe that the centralized feature is dissociated from the call after call service is performed by the centralized feature. Support for the claim amendments is provided in Applicant's original specification, for example, at p. 2, lines 13-16, p. 5, lines 12-14 and lines 21-24, p. 6, lines 5-9, p. 6, lines 23-24 and lines 28-31.

2.   <u>Claims 22-24 and 29-36 were rejected under 35 USC 103(a) as unpatentable over Hakim, in view of Gossett et al.</u>

Hakim teaches an Internet voice call originated through an Internet Telephony Server (ITS). The ITS receives the call over the PSTN and routes the call to a destination ITS (e.g., Hakim at col. 4, lines 49-55) for the terminating destination. Hakim teaches an enhancement to provide the ability of the caller to dial a destination telephone number that is a toll-free service or other similar type of number for making the call. The call to the originating ITS is then routed to the destination ITS, and the destination ITS dials over the PSTN to connect the call to the destination number. Thus, the originating ITS and terminating ITS control the route and and enable the connection on the PSTN for the destination number.

Hakim's originating and terminating ITS's are a "gatekeeper." The gatekeeper permits/disallows the call via toll-free service to reach the destination number on the PSTN.

Hakim's ITS's do not provide any call service or feature for the call, itself. Rather, the ITS's merely connect the call to destination, by routing over the packet network and calling the PSTN destination number at the terminating ITS. The ITS's do not perform any distinct call service for the call once the call is permitted for the toll-free service, and do not direct the call to a feature platform for such a call service for the call.

Gossett teaches a routing engine of the packet network. The routing engine communicates with the unique originating gateway of the call, and selects available destination gateways based on designated preferences defined by that unique originating gateway (e.g., cost and quality requirements for the call, as designated by the unique originating gateway) (Gossett at col. 5, lines 14-19). The Gossett routing engine, therefore, bases routing of the call on the particular unique originating gateway for the call. The unique originating gateway dictates what the routing engine chooses for the route. Each distinct originating gateway of the network can have respective designated preferences that dictate how the routing engine routes and connects a call through that distinct originating gateway onto the PSTN. Gossett's routing engine is dependent on preferences of the unique originating gateway for each respective call, and does not provide any call service for the call. Moreover, Gossett can not provide call services via centralized feature platform, such that the call services are available to multiple calls each originating from different originating gateways.

Both Hakim and Gossett teach an originating gateway that provides "edge centralization" function for the call on the network. Hakim's originating gateway determines whether the call should be permitted over the toll-free service and, if so, enables the terminating gateway connection to destination on the PSTN. Gossett's originating gateway dictates what destination gateway(s) to which the routing engine routes the call. As described in Applicant's specification

in the background, the Hakim and Gossett edge centralization on the network requires that each separate "edge" gateway must provide any functionality that applies for the call.

Applicant's amended claims describe that a call service for the call is provided by a centralized feature platform. Because the feature platform provides centralized operations in the manner described in Applicant's amended claims, the same call service is available to multiple calls each originated from different gateways. Centralization of the operation of the call service avoids the "edge" complexity (i.e., of each gateway for calls having necessary support to provide various feature services) that is required for operations as taught and suggested by Hakim and Gosset.

Applicant's newly added claims 37-39 point out that multiple calls from different gateways are directed to the centralized feature and that different call service can be performed as to the respective calls.

Applicant respectfully requests withdrawal of the objection and rejection and allowance of all pending claims.

In view of the foregoing, Applicant respectfully requests reconsideration and allowance of all pending claims 22-24 and 29-36, and issuance of a timely Notice of Allowance in this case.

If the Examiner has any questions or comments, the undersigned attorney for Applicant respectfully requests a call to discuss any issues. The Office is authorized to charge any excess fees or to credit any overage to the undersigned's Deposit Account No. 50-1350.

Respectfully submitted,

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